## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS MCALLEN DIVISION

AUG 1 1 2008

Michael N. Milby, Cleri

Jorge H. TREVINO, M.D. and James	§	
STEWARD, M.D.	§	
Plaintiffs	§	
V.	§	CIVIL ACTION NO. 7:08-CV-00219
	§	(JURY DEMANDED)
Ruben PECHERO, M.D.; Vicki Lynn	§	
CHRYSLER; Alex TREVINO, and	§	
MOBILE VIDEO TAPES	§	
Defendants	§	

# DEFENDANT VICKI LYNN CHRYSLER'S ANSWER TO PLAINTIFF'S ORIGINAL COMPLAINT

#### TO THE HONORABLE JUDGE:

COMES NOW Defendant CHRYSLER and files this her Original Answer and would respectfully show the Court as follows:

## I. ANSWER

- 1. Defendant CHRYSLER cannot admit or deny the multiple allegations set forth in paragraph 1 as Defendant does not have sufficient information.
- 2. Defendant CHRYSLER denies the allegations in paragraph 2.
- 3. Defendant CHRYSLER admits that a claim has been brought forth by Plaintiffs, deny all other allegations in paragraph 3.
- 4. Defendant CHRYSLER can neither admit or deny the allegations until further information is obtained.
- 5. Defendant CHRYSLER can neither admit or deny the allegations until further information is obtained.
- 6. Defendant CHRYSLER can neither admit or deny the allegations until further

- information is obtained.
- 7. Defendant CHRYSLER admits the allegations in paragraph 7.
- 8. Defendant CHRYSLER cannot admit or deny the multiple allegations set forth in paragraph 8 as Defendant does not have sufficient information.
- 9. Defendant CHRYSLER cannot admit or deny the multiple allegations set forth in paragraph 9 as Defendant
- 10. Defendant CHRYSLER admits the allegations in paragraph 10.
- 11. Defendant CHRYSLER cannot admit or deny the multiple allegations set forth in paragraph 11 as Defendant does not have sufficient information.
- 12. Defendant CHRYSLER admits the allegations in paragraph 12.
- 13. Defendant CHRYSLER admits the allegations in paragraph 13.
- 14. Defendant CHRYSLER cannot admit or deny the multiple allegations set forth in paragraph 14 as Defendant does not have sufficient information.
- 15. Defendant CHRYSLER denies allegations of paragraph 15.
- 16. Defendant CHRYSLER denies allegations of paragraph 16.
- 17. Defendant CHRYSLER denies allegations of paragraph 17.
- 18. Defendant CHRYSLER denies allegations of paragraph 18.
- 19. Defendant CHRYSLER denies allegations of paragraph 19.
- 20. Defendant CHRYSLER denies allegations of paragraph 20.
- 21. Defendant CHRYSLER denies allegations of paragraph 21.
- 22. Defendant CHRYSLER denies allegations of paragraph 22.
- 23. Defendant CHRYSLER denies allegations of paragraph 23.
- 24. Defendant CHRYSLER denies allegations of paragraph 24.
- 25. Defendant CHRYSLER denies allegations of paragraph 25.

- 26. Defendant CHRYSLER denies allegations of paragraph 26.
- 27. Defendant CHRYSLER cannot admit or deny the multiple allegations set forth in paragraph 27 as Defendant does not have sufficient information.
- 28. Defendant CHRYSLER cannot admit or deny the multiple allegations set forth in paragraph 28 as Defendant does not have sufficient information.
- 29. Defendant CHRYSLER cannot admit or deny the allegations set forth in paragraph 29 as Defendant does not have sufficient information.
- 30. Defendant CHRYSLER cannot admit or deny the allegations set forth in paragraph 30 as Defendant does not have sufficient information.
- 31. Defendant CHRYSLER cannot admit or deny the multiple allegations set forth in paragraph 31 as Defendant does not have sufficient information.
- 32. Defendant CHRYSLER cannot admit or deny the multiple allegations set forth in paragraph 32 as Defendant does not have sufficient information.
- 33. Defendant CHRYSLER cannot admit or deny the multiple allegations set forth in paragraph 33 as Defendant does not have sufficient information.
- 34. Defendant CHRYSLER denies allegations of paragraph 34.
- 35. Defendant CHRYSLER denies allegations of paragraph 35.
- 36. Defendant CHRYSLER denies allegations of paragraph 36.
- 37. Defendant CHRYSLER denies allegations of paragraph 37.
- 38. Defendant CHRYSLER denies allegations of paragraph 38.
- 39. Defendant CHRYSLER denies allegations of paragraph 39.
- 40. Defendant CHRYSLER denies allegations of paragraph 40.
- 41. Defendant CHRYSLER denies allegations of paragraph 41.

- 42. Defendant CHRYSLER denies allegations of paragraph 42.
- 43. Defendant CHRYSLER denies allegations of paragraph 43.
- 44. Defendant CHRYSLER cannot admit or deny the allegations set forth in paragraph 44 as Defendant does not have sufficient information.
- 45. Defendant CHRYSLER denies allegations of paragraph 45.
- 46. Defendant CHRYSLER denies allegations of paragraph 46.
- 47. Defendant CHRYSLER denies allegations of paragraph 47.
- 48. Defendant CHRYSLER denies allegations of paragraph 48.
- 49. Defendant CHRYSLER denies allegations of paragraph 49.
- 50. Defendant CHRYSLER denies allegations of paragraph 50.
- 51. Defendant CHRYSLER denies allegations of paragraph 51.
- 52. Defendant CHRYSLER denies allegations of paragraph 52.
- 53. Defendant CHRYSLER denies allegations of paragraph 53.
- 54. Defendant CHRYSLER cannot admit or deny the allegations set forth in paragraph 54 as Defendant does not have sufficient information.
- 55. Defendant CHRYSLER cannot admit or deny the allegations set forth in paragraph 55 as Defendant does not have sufficient information.
- 56. Defendant CHRYSLER denies allegations of paragraph 56.
- 57. Defendant CHRYSLER denies allegations of paragraph 57
- 58. Defendant CHRYSLER cannot admit or deny the allegations set forth in paragraph 58 as Defendant does not have sufficient information.
- 59. Defendant CHRYSLER cannot admit or deny the allegations set forth in paragraph 59 as Defendant does not have sufficient information.

- 60. Defendant CHRYSLER cannot admit or deny the allegations set forth in paragraph 60 as Defendant does not have sufficient information.
- 61. Defendant CHRYSLER cannot admit or deny the allegations set forth in paragraph 61 as Defendant does not have sufficient information.
- 62. Defendant CHRYSLER cannot admit or deny the allegations set forth in paragraph 62 as Defendant does not have sufficient information.
- 63. Defendant CHRYSLER cannot admit or deny the allegations set forth in paragraph 63 as Defendant does not have sufficient information.
- 64. Defendant CHRYSLER cannot admit or deny the allegations set forth in paragraph 64 as Defendant does not have sufficient information.
- 65. Defendant CHRYSLER cannot admit or deny the allegations set forth in paragraph 65 as Defendant does not have sufficient information.
- 66. Defendant CHRYSLER cannot admit or deny the allegations set forth in paragraph 66 as Defendant does not have sufficient information.
- 67. Defendant CHRYSLER cannot admit or deny the allegations set forth in paragraph 67 as Defendant does not have sufficient information.
- 68. Defendant CHRYSLER denies allegations of paragraph 68.
- 69. Defendant CHRYSLER denies allegations of paragraph 69.
- 70. Defendant CHRYSLER denies allegations of paragraph 70.
- 71. Defendant CHRYSLER denies allegations of paragraph 71.
- 72. Defendant CHRYSLER denies allegations of paragraph 72.
- 73. Defendant CHRYSLER denies allegations of paragraph 73.
- 74. Defendant CHRYSLER denies allegations of paragraph 74.

- 75. Defendant CHRYSLER denies allegations of paragraph 75.
- 76. Defendant CHRYSLER denies allegations of paragraph 76.
- 77. Defendant CHRYSLER denies allegations of paragraph 77.
- 78. Defendant CHRYSLER denies allegations of paragraph 78.
- 79. Defendant CHRYSLER denies allegations of paragraph 79.
- 80. Defendant CHRYSLER denies allegations of paragraph 80.
- 81. Defendant CHRYSLER cannot admit or deny the allegations set forth in paragraph 81 as Defendant does not have sufficient information.
- 82. Defendant CHRYSLER denies allegations of paragraph 82.
- 83. Defendant CHRYSLER denies allegations of paragraph 83.
- 84. Defendant CHRYSLER denies allegations of paragraph 84.
- 85. Defendant CHRYSLER denies allegations of paragraph 85.
- 86. Defendant CHRYSLER denies allegations of paragraph 86.
- 87. Defendant CHRYSLER denies allegations of paragraph 87.
- 88. Defendant CHRYSLER denies allegations of paragraph 88.
- 89. Defendant CHRYSLER cannot admit or deny the allegations set forth in paragraph 89 as Defendant does not have sufficient information.
- 90. Defendant CHRYSLER cannot admit or deny the multiple allegations set forth in paragraph 90 as Defendant does not have sufficient information.
- 91. Defendant CHRYSLER denies allegations of paragraph 91.
- 92. Defendant CHRYSLER denies allegations of paragraph 92.
- 93. Defendant CHRYSLER denies the allegations of paragraph 93.
- 94. Defendant CHRYSLER denies allegations of paragraph 94.

- 95. Defendant CHRYSLER denies the allegations of paragraph 95.
- 96. Defendant CHRYSLER denies the allegations of paragraph 96.
- 97. Defendant CHRYSLER denies the allegations of paragraph 97.
- 98. Defendant CHRYSLER denies the allegations of paragraph 98.
- 99. Defendant CHRYSLER cannot admit or deny the multiple allegations set forth in paragraph 99 as Defendant does not have sufficient information.
- 100. Defendant CHRYSLER cannot admit or deny the multiple allegations set forth in paragraph 100 as Defendant does not have sufficient information.
- 101. All other allegations which have not been specifically admitted are denied.
- 102. WHEREFORE PREMISES CONSIDERED, Defendant CHRYSLER asks the Court to enter judgment that Plaintiffs take nothing, and award Defendant CHRYSLER all other relief to which she is entitled.

Respectfully submitted

Wicki Lynn Ohrysler

Pro Se

4854 South Jackson Road

Edinburg, Texas 78539

Telephone: Facsimile:

(956) 668-7528 (956) 668-7530

# **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the above pleading has been forwarded to all known counsel be electronic notification, first class mail, facsimile, hand delivery and/or certified mail, return receipt requested on this the 11<sup>th</sup> day of August, 2008:

Mr. Orlando Jimenez Hill & Jimenez, P.C. 211 W. Park, Ave. Pharr, Texas 78577

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